

Exhibit A

Megan Ix Brison

From: Elizabeth Wilburn Joyce
Sent: Friday, March 17, 2023 6:39 PM
To: Thomas Urban; Megan Ix Brison; Bradley P. Lehman; Margaret F. England
Cc: Tony Lee; Seth Williams; Maria Whalen
Subject: RE: Discrete Holdings v. Intrado -- Stipulation Amending Scheduling Order

Tom, thank you for your emails.

Plaintiffs' Supplemental Interrogatory Response served this afternoon purports to dramatically expand the scope of discovery. We will not be able to confer with our client regarding Plaintiffs' new position by Tuesday, and how it might impact the schedule or discovery.

In addition, before we set the meet & confer to encompass discovery issues, we need to know whether or not Plaintiff's March 15 production is intended to be Plaintiffs' final production?

We note from a quick review that Plaintiffs have produced zero attachments to emails in the March 15th production, even though this was an issue raised in Ms. Brison's January 12th letter as being a problem with Plaintiffs' prior productions.

Given Plaintiffs' latest assertions, Intrado's document requests Number 15 and 16 are highly relevant:

- No. 15: All Documents and Communications relating to the drafting and negotiation of provisions in the SPA related to indemnification of Defendant, including, but not limited to the following provisions in the SPA: §11.01(a)(ii); §11.01(a)(v); §11.01(e); and §11.01(f).
- No. 16: All Documents and Communications relating to the drafting and negotiation of the definition of Tax and Taxes in the SPA.

We do not believe Plaintiffs have completed their response to these requests, but please tell us if Plaintiffs contend they are finished with their production.

Based upon the position taken in Plaintiffs' Supplemental Response to Interrogatory No. 15, it seems Plaintiffs intend to place the negotiation of the SPA and its related documents at issue in this litigation.

Are Plaintiffs refusing to produce attachments to emails during such negotiation? Do Plaintiffs contend that they have resolved all of the issues raised in Ms. Brison's January 12th letter?

We are continuing to review the deficiencies previously raised in Ms. Brison's letters, and reserve all of Intrado's rights in that regard. We are also continuing to review the issues raised by Plaintiffs regarding Intrado's discovery responses.

With respect to the email appearing at DH 951-953, please identify the document request to which Plaintiffs contend such email(s) are responsive? The issues appearing in the Supplemental Interrogatory Response are not apparent in Plaintiffs' Document Requests or the Complaint.

We will be back to you early next week after we've had the opportunity to confer with our client on these matters. If Plaintiffs have an agenda for the meet & confer, please circulate it. We will then try to do the same.

Regards,
Elizabeth